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Attorneys for Defendant  
WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MOHAMMAD SUBHANI,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL  
ASSOCIATION an FDIC insured corporation  
and does 1 through 100, inclusive,

Defendant.

Case No.: 3:12-cv-01755-MEJ

**STIPULATION TO CONTINUE  
DEFENDANT'S DEADLINE TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

Complaint Date: March 8, 2012

WHEREAS, on March 8, 2012, plaintiff Mohammad Subhani ("Plaintiff") filed an initial complaint ("Complaint") in the Superior Court of the State of California, for the County of Contra Costa, Case No. C 12-00551 ("Action");

WHEREAS, on March 8, 2012, Plaintiff served the Complaint upon defendant Wells Fargo Bank, N.A. ("Wells Fargo");

WHEREAS, on April 9, 2012, Wells Fargo removed the Action to this Court;

WHEREAS, under the Federal Rules of Civil Procedure, Wells Fargo's current deadline to answer or otherwise respond to the Complaint is April 16, 2012;

WHEREAS, the parties have engaged in settlement discussions, which are ongoing;

WHEREAS, to facilitate the parties' settlement discussions, Plaintiff has agreed to extend the deadline for Wells Fargo to answer or otherwise respond to the Complaint by 14 days; and

WHEREAS, the agreed-upon extension will not alter the date of any event or any deadline already fixed by Court order;

NOW THEREFORE, IT IS HEREBY STIPULATED by the parties hereto, through their respective counsel, that:

1. The time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including April 30, 2012; and

2. This stipulation is without prejudice to the rights, claims, arguments and defenses of all parties.

DATED: April 11, 2012

SAGARIA LAW, P.C.

By: /s/ Elliott W. Gale  
Elliot W. Gale

Attorneys for Plaintiff  
Mohammad Subhani

DATED: April 11, 2012

SEVERSON & WERSON  
A Professional Corporation

By: /s/ Alisa A. Givental  
Alisa A. Givental

Attorneys for Defendant  
Wells Fargo Bank, N.A.

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of the document has been obtained from Elliott W. Gale.


/s/ Alisa A. Givental  
Alisa A. Givental

**PROPOSED ORDER**

Pursuant to the stipulation of the parties and GOOD CAUSE APPEARING:

IT IS HEREBY ORDERED that the time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including April 30, 2012.

DATED: April 16, 2012



UNITED DISTRICT COURT OF THE  
NORTHERN DISTRICT OF CALIFORNIA  
CHIEF MAGISTRATE JUDGE MARIA-  
ELENA JAMES